

1 MICHAEL A. JACOBS (CA SBN 111664)  
MJacobs@mofo.com  
2 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
3 ERIC A. TATE (CA SBN 178719)  
ETate@mofo.com  
4 MORRISON & FOERSTER LLP  
425 Market Street  
5 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
6 Facsimile: 415.268.7522  
  
7 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.,  
8 OTTOMOTTO LLC, and OTTO TRUCKING LLC

9 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsflp.com  
10 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsflp.com  
11 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
12 Washington DC 20005  
Telephone: 202.237.2727  
13 Facsimile: 202.237.6131

14 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
15 and OTTOMOTTO LLC

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,  
20 Plaintiff,  
21 v.  
22 UBER TECHNOLOGIES, INC.,  
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MEREDITH R.  
DEARBORN IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF DEFENDANTS'  
SUPPLEMENTAL BRIEFING  
REGARDING MOTION TO  
COMPEL ARBITRATION  
HEARING'S QUESTIONS 3 AND 4  
(DKT. 263) AND ADDITIONAL  
QUESTIONS FROM THE COURT**

Trial Date: October 2, 2017

1 I, Meredith R. Dearborn, declare as follows:

2 1. I am a partner at the law firm of Boies Schiller Flexner LLP. I am a member in  
3 good standing of the Bar of the State of California. I make this declaration based upon matters  
4 within my own personal knowledge and if called as a witness, I could and would competently  
5 testify to the matters set forth herein.

6 2. I make this declaration in support of Defendants' Administrative Motion to File  
7 Under Seal Portions of Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC's  
8 Supplemental Briefing Regarding Motion To Compel Arbitration Hearing's Questions 3 and 4  
9 (Dkt. 263) and Additional Questions From The Court ("Defendants' Supplemental Brief").

10 3. The redacted portions of Defendants' Supplemental Brief discuss Uber's highly  
11 confidential strategy and plans for the future relating to Uber's LiDAR system and technology.

12 4. I understand that this strategy information is maintained as confidential by Uber in  
13 the ordinary course of business. I understand that the public disclosure of this information would  
14 cause harm to Uber by giving Uber's potential competitors access to Uber's non-public strategy  
15 information and business plans.

16 5. Uber's request to seal is narrowly tailored to that portion of the Supplemental Brief  
17 that merits sealing.

18 I declare under penalty of perjury under the laws of the United States that the foregoing is  
19 true and correct. Executed this 1st day of May, 2017, in Oakland, California.

20  
21 /s/ Meredith R. Dearborn

22 Meredith R. Dearborn  
23  
24  
25  
26  
27  
28